

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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AMANDA FLANNERY,  
Plaintiff,  
- against -

THE CITY OF ROCHESTER, a municipal entity,  
PAUL ROMANO, "JOHN DOE POLICE  
OFFICERS 1-200" (names and number of whom are  
unknown at present), COUNTY OF MONROE,  
TODD BAXTER, "RICHARD ROE SHERIFF'S  
DEPUTIES 1-200" (names and number of whom are  
unknown at present), and other unidentified members  
of the Rochester Police Department and Monroe  
County Sheriff's Office,

Defendants.

**NOTICE OF MOTION TO  
PARTIALLY DISMISS THE  
AMENDED COMPLAINT**

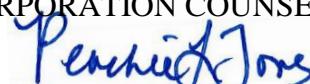
Case no: 22-cv-6101

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Defendants City of Rochester ("City") and Paul Romano (collectively "City Defendants")  
move this Court pursuant to FED. R. CIV. P. 12(b)(6) to dismiss the first, third, fourth, seventh, eighth,  
eleventh, twelfth, and thirteenth claims in the Amended Complaint of the above-entitled action for  
failure to state a claim for relief.

In support of this motion the Court is referred to the Declaration of Peachie L. Jones, Esq.,  
with exhibit attached, and the Memorandum of Law, all submitted herewith and made part of this  
motion. City Defendants reserve the right to file a reply memorandum of law within fourteen days of  
Plaintiff's filing any opposition to this motion.

Date: March 3, 2022  
Rochester, NY

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